

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMANDA OFRIA,

Plaintiff,

v.

MASSACHUSETTS BAY LINES, INC.,
AMBER DEVELOPMENT
CORPORATION, and MINA MURRAY
D/B/A BOSTON BEAU TEASE,
FORMERLY D/B/A THE BOSTON
BABYDOLLS,

Defendants.

CIVIL ACTION NO. 1:16-cv-11485

COMPLAINT AND JURY DEMAND

INTRODUCTION

1. This is an action for personal injuries which occurred on or about August 5, 2015 while the Plaintiff, Amanda Ofria was a passenger aboard the M/V FREEDOM, which was owned, operated, chartered and/or controlled by the Defendants, Massachusetts Bay Lines, Inc. and Amber Development Corporation. The Plaintiff asserts causes of action against the Defendants for personal injuries and under the General Maritime Law.

JURISDICTION AND VENUE

2. This is a maritime case being brought pursuant to 28 U.S.C. § 1333(1).
3. Venue is proper pursuant to 28 U.S.C. § 1391(c).

PARTIES

4. The Plaintiff, Amanda Ofria, is of legal age and resides at 281 Elmwood Road, Lunenburg, Massachusetts.
5. The Defendant, Massachusetts Bay Lines, Inc., is a domestic corporation with a principal place of business at 60 Rowes Wharf in Boston, Massachusetts and, at all relevant times,

owned, maintained, managed, operated, chartered and/or controlled the vessel known as the M/V FREEDOM having a U.S. Coast Guard Number of 927011.

6. The Defendant, Amber Development Corporation, is a domestic corporation with a principal place of business at 60 Rowes Wharf in Boston, Massachusetts and, at all relevant times, owned, maintained, managed, operated, chartered and/or controlled the vessel known as the M/V FREEDOM having a U.S. Coast Guard Number of 927011.
7. The Defendant, Mina Murray d/b/a Boston Beau Tease, formerly d/b/a Boston Babydolls, is a natural person with a place of business or residence at 119 Braintree Street, Suite 206, Allston, Massachusetts and, at all relevant times, owned, maintained, managed, operated, and/or controlled a burlesque show on the relevant cruise ship.

FACTUAL ALLEGATIONS

8. On August 5, 2015, the Plaintiff, Amanda Ofria was passenger on a cruise aboard the M/V FREEDOM which was transporting passengers for hire for purposes of entertainment.
9. While the M/V FREEDOM was operating and while the Plaintiff was in the exercise of due care, she sustained serious personal injuries due to the negligence of the Defendants, their agents, servants and/or employees, which caused the Plaintiff to fall on a dangerously placed sound speaker/light base improperly placed in a walk way.

COUNT I

Amanda Ofria v. Massachusetts Bay Lines, Inc.
(General Maritime Law- Negligence)

10. Paragraphs 1-9 are re-alleged and incorporated herein by reference.
11. The injuries sustained by the Plaintiff were due to no fault of his own, but were caused by the negligence of the Defendant.

12. As a result of said injuries, the Plaintiff has suffered great pain of body and anguish of mind, incurred medical and hospital expenses, loss of time from her usual work and has suffered and will suffer other damages as will be shown at the trial of this matter.
13. This cause of action is brought for Negligence under the General Maritime Law.

REQUEST FOR RELIEF

14. That this Court, under Count I, enter judgment in favor of the Plaintiff against the Defendant.
15. For such other relief as this Court deems appropriate.

COUNT II

Amanda Ofria v. Amber Development Corporation
(General Maritime Law- Negligence)

16. Paragraphs 1-15 are re-alleged and incorporated herein by reference.
17. The injuries sustained by the Plaintiff were due to no fault of his own, but were caused by the negligence of the Defendant.
18. As a result of said injuries, the Plaintiff has suffered great pain of body and anguish of mind, incurred medical and hospital expenses, loss of time from her usual work, and has suffered and will suffer other damages as will be shown at the trial of this matter.
19. This cause of action is brought for Negligence under the General Maritime Law.

REQUEST FOR RELIEF

20. That this Court, under Count II, enter judgment in favor of the Plaintiff against the Defendant.
21. For such other relief as this Court deems appropriate.

COUNT III

Amanda Ofria v. Mina Murray d/b/a Boston Babydolls
(Negligence)

22. Paragraphs 1-21 are re-alleged and incorporated herein by reference.
23. The injuries sustained by the Plaintiff were due to no fault of her own, but were caused by the negligence of the Defendant.
24. As a result of said injuries, the Plaintiff has suffered great pain of body and anguish of mind, incurred medical and hospital expenses, loss of time from her usual work, and has suffered and will suffer other damages as will be shown at the trial of this matter.
25. This cause of action is brought for Negligence.

REQUEST FOR RELIEF

26. That this Court, under Count III, enter judgment in favor of the Plaintiff against the Defendant.
27. For such other relief as this Court deems appropriate.

THE PLAINTIFF REQUESTS TRIAL BY JURY ON ALL COUNTS

Respectfully submitted,

The Plaintiff, Amanda Ofria,
By her attorneys,



Edmund P. Hurley (BBO No. 556019)
Blaine J. DeFreitas & Associates
One Pleasant Street
Maynard, MA 01754
1-978-897-0339
Facsimile: 1-978-897-6146
DeFreitasLaw@comcast.net

Dated: July 18, 2016